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Appendix K Comment Letters On the Draft EIR

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A P P E N D I X K

C O M M E N T L E T T E R S O N T H E
D R A F T E I R



California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



May 14, 2024

SCH #: 2023060025
GTS #: 04-SF-2023-00394
GTS ID: 29980
Co/Rt/Pm: SF/101/T5.222

Rhiannon Bailard, Chief Operation Officer
University of California College of the Law, San Francisco
200 McAllister Street
San Francisco, CA 94102

Re: University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project – Draft Environmental Impact Report (DEIR)

Dear Rhiannon Bailard:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2024 DIER.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project provides an update for the Long Range Campus Plan of the University of California College of the Law, San Francisco which includes a proposal for a new mixed-use building at 201-247 Golden Gate Avenue. This new mixed-use building would contribute to additional campus housing, academic space, and office space. The project area is in vicinity of US-101.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle

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Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the San Francisco Planning Department's Transportation Impact Guidelines and the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Marley Mathews, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

May 21, 2024

Rhiannon Bailard
Chief Operating Officer
University of California College of the Law, San Francisco
200 McAllister Street
San Francisco, CA 94102
operations@uclawsf.edu

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE UNIVERSITY OF CALIFORNIA COLLEGE OF THE LAW, SAN FRANCISCO LONG RANGE CAMPUS PLAN UPDATE AND 201 GOLDEN GATE AVENUE MIXED-USE PROJECT DATED APRIL 10, 2024 STATE CLEARINGHOUSE NUMBER [2023060025](#)

Dear Rhiannon Bailard,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project. The proposed Long Range Campus Plan (LRCP) Update would provide a high-level planning framework to guide land use and capital investment in the LRCP planning area, in line with the University of California College of the Law, San Francisco's (College) mission, priorities, and strategic goals. The LRCP planning area includes the entire existing College campus as well as the property owned by Unite Here Local 2 Union (Local 2) at 201-247 Golden Gate Avenue. The proposed 201 Golden Gate Avenue-Mixed Use Project (mixed-use development) would develop a new

12- or 13-story building at the Local 2 property, expanding the College's footprint by a quarter of a city block. The College has developed two conceptual scenarios (variants) for the proposed mixed-use development, referred to as Academic Light (Variant 1) and Academic Heavy (Variant 2). In either scenario, the proposed mixed-use development would involve the demolition of the existing on-site buildings, and the construction and operation of a new single building, with a mix of uses dedicated to academic/programmatic space, campus housing, and space for the hospitality workers labor union Local 2's operations and functions, including a hiring hall.

While reviewing the project, DTSC reached out to the University of California College of the Law, San Francisco on multiple attempts to retrieve the Phase I Environmental Site Assessment to no avail. The inability to retrieve the Phase I Environmental Site Assessment for our review did not allow us to view recommendations or conclusive evidence to dismiss any further action under CEQA; therefore, DTSC recommends and requests consideration of the following comments:

1. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
2. All imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill

Rhiannon Bailard

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material meets screening levels outlined in the [PEA](#) for the intended land use.

The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC appreciates the opportunity to comment on the University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Planning and

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Dave Kereazis

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Scott Wiley

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HWMP - Permitting Division – CEQA Unit

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University of California College of Law, San Francisco
 Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project
 Draft Environmental Impact Report Public Comment Meeting Sign-In Sheet
 Tuesday, May 21, 2024, 4:30 to 5:30 p.m.

Name	Address	Email	Yes, add to mailing list
Tina Chen	209 Golden Gate Ave.	telene@unilthere.org	
JAVY WORTH	209 Golden Gate Ave		
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